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926 RXR Plaza  
Uniondale, NY 11556-0926  
T 516.357.3000 F 516.357.3333

LAURA J. MULHOLLAND  
ASSOCIATE  
(516) 357-3274  
[laura.mulholland@rivkin.com](mailto:laura.mulholland@rivkin.com)

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July 23, 2020

**Via ECF**

Honorable Mary Kay Vyskocil  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, New York 10007

Re: *Silvana R. Barahona and Dr. Lori Victoria Coronato v. State Farm,*  
Docket No. 1:19-cv-10762 (MKV) (DCF)

Dear Judge Vyskocil:

We represent Defendant, State Farm Fire and Casualty Company ("State Farm"), in the above-referenced action. Please allow this letter to serve as the parties' joint request for an extension of the dates set forth in the Scheduling Order in this matter dated April 10, 2020 (Docket No. 18).

To date, the parties have been working cooperatively and have completed their exchange of discovery demands, interrogatories and document productions. Plaintiffs also have filed an Amended Complaint, and State Farm has filed its Answer to the Amended Complaint. Plaintiffs' depositions are scheduled to begin on August 3, 2020, with State Farm's deposition to be scheduled and completed in succession thereafter.

Despite good faith efforts on both sides, the parties will not be able to complete depositions by the August 1, 2020 deadline set forth in the Scheduling Order, notwithstanding their willingness to do so virtually. The parties therefore respectfully request that the remaining deadlines in the Scheduling Order be adjusted as follows:

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- a. Depositions to be completed by: ~~August 4, 2020~~ September 21, 2020
- b. Deadline to complete fact discovery: ~~August 5, 2020~~ September 28, 2020
- c. All expert discovery shall be completed no later than: ~~October 5, 2020~~ November 27, 2020

This is the parties' second request for an adjournment or extension of time. The parties' first request, dated March 16, 2020, was to adjourn the Initial Pretrial Conference or convert to a teleconference in view of concerns related to COVID-19. That request was granted.

We appreciate the Court's consideration of our request. Please do not hesitate to contact the undersigned should the Court require anything further.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ *Laura J. Mulholland*

Laura J. Mulholland

cc: All counsel of record (via ECF)

GRANTED. The deadlines for discovery are extended as set forth herein. The Court is unlikely to extend further any discovery deadline. The Parties are reminded that to the extent disputes arise in discovery and Court intervention is required, the disputes must be raised with enough time to allow the Court to rule on the dispute and for any resulting discovery to occur within the existing deadlines. The Post-Discovery Conference scheduled for October 21 is adjourned to December 9, 2020 at 10:30AM. The Clerk is respectfully requested to close the motions at ECF 26 and 27.

Date: 7/24/2020  
New York, New York

*Mary Kay Viskocil*  
Mary Kay Viskocil  
United States District Judge